

THE SCHEME

3. Defendant GEORGE TAYLOR pretended to be other people in order to cash stolen, counterfeit, and otherwise unauthorized checks at Citizens Bank and to make unauthorized withdrawals from Citizens Bank.

4. On each occasion, defendant GEORGE TAYLOR presented to a teller a fraudulent check payable to a Citizens Bank account holder or a withdrawal slip. Defendant TAYLOR, pretending to be the Citizens Bank account holder and check payee or the maker of the withdrawal slips, then asked the bank to process the transactions.

5. On some occasions, defendant GEORGE TAYLOR obtained fake identifications, including Pennsylvania driver's licenses, that identified him as the Citizens Bank account holders that he pretended to be. Defendant TAYLOR presented these fraudulent identifications when he asked the tellers to process his transactions.

6. By cashing the checks in other people's names and making unauthorized withdrawals in other people's names, defendant GEORGE TAYLOR stole and attempted to steal approximately \$244,307.45 from Citizens Bank.

7. In this manner, defendant GEORGE TAYLOR cashed and attempted to cash each of the checks and processed and attempted to process each of the withdrawals listed below:

DATE	TRANSACTION TYPE	PURPORTED MAKER OF CHECK OR WITHDRAWAL SLIP	CHECK OR WITH- DRAWAL SLIP PAYEE	TYPE OF FRAUDU- LENT ID	AMOUNT
6/18/2004	check no. 1030	L.P.	R.P.	PA driver's license	\$4,000
6/18/2004	counter check	R.P.	R.P.	PA driver's license	\$3,800
6/18/2004	check no. 1032	L.P.	R.P.	PA driver's license	\$4,000
6/18/2004	counter check	R.P.	"cash"	PA driver's license	\$4,000
6/21/2004	check no. 1031	L.P.	R.P.	PA driver's license	\$2,800
6/22/2004	counter check	R.P.	"cash"	PA driver's license	\$6,000
6/23/2004	withdrawal slip	P.B.	P.B.	PA driver's license	\$3,800
6/23/2004	withdrawal slip	P.B.	P.B.	PA driver's license	\$3,500
6/24/2004	check no. 221	W.M.	P.B.	PA driver's license	\$4,300
7/10/2004	check no. 171	S.A.	R.S.	PA driver's license	\$4,300
7/10/2004	counter check	R.S.	"cash"	PA driver's license	\$4,000
7/10/2004	check no. 161	S.A.	R.S.	PA driver's license	\$4,500
7/10/2004	counter check	R.S.	"cash"	PA driver's license	\$3,000
7/11/2004	check no. 192	M.W.	R.S.	PA driver's license	\$3,700
7/11/2004	counter check	R.S.	"cash"	PA driver's license	\$4,000
7/11/2004	check no. 196	M.W.	R.S.	PA driver's license	\$5,300
7/11/2004	counter check	R.S.	"cash"	PA driver's license	\$5,000
7/12/2004	check no. 175	S.A.	R.S.	PA driver's license	\$4,500
7/12/2004	counter check	R.S.	"cash"	PA driver's license	\$6,000
7/12/2004	check no. 172	S.A.	R.S.	PA driver's license	\$4,500
7/12/2004	counter check	R.S.	R.S.	PA driver's license	\$9,000
7/13/2004	check no. 215	M.W.	R.S.	PA driver's license	\$4,500

7/13/2004 counter check R.S. "cash" PA driver's license \$8,000

DATE	TRANSACTION TYPE	PURPORTED MAKER OF CHECK OR WITHDRAWAL SLIP	CHECK OR WITHDRAWAL SLIP PAYEE	TYPE OF FRAUDULENT ID	AMOUNT
7/13/2004	check no. 214	M.W.	R.S.	PA driver's license	\$4,700
8/26/2004	check no. 166	S.A.	F.T.	PA driver's license	\$4,500
8/26/2004	check no. 164	S.A.	F.T.	PA driver's license	\$4,500
8/26/2004	counter check	F.T.	"cash"	PA driver's license	\$2,000
8/28/2004	check no. 167	S.A.	F.T.	PA driver's license	\$4,500
8/28/2004	check no. 168	S.A.	F.T.	PA driver's license	\$4,500
9/2/2004	counter check	F.M.	F.M.	PA driver's license	\$2,500
9/3/2004	check no. 2446	A.G.G. & Associates, P.C.	F.M.	PA driver's license	\$4,256.08
9/10/2004	check no. 404	P.R.	H.D.	PA driver's license	\$4,800
9/10/2004	check no. 405	P.R.	H.D.	PA driver's license	\$4,600
9/11/2004	check no. 406	P.R.	H.D.	PA driver's license	\$4,600
9/11/2004	withdrawal slip	H.D.	H.D.	PA driver's license	\$3,500
9/11/2004	check no. 407	P.R.	H.D.	PA driver's license	\$4,700
9/11/2004	withdrawal slip	H.D.	H.D.	PA driver's license	\$3,500
9/12/2004	check no. 408	P.R.	H.D.	PA driver's license	\$4,600
9/12/2004	withdrawal slip	H.D.	H.D.	PA driver's license	\$2,500
9/12/2004	check no. 409	P.R.	H.D.	PA driver's license	\$4,700
9/12/2004	withdrawal slip	H.D.	H.D.	PA driver's license	\$3,500
9/13/2004	withdrawal slip	H.D.	H.D.	PA driver's license	\$6,500
9/13/2004	withdrawal slip	H.D.	H.D.	PA driver's license	\$4,500

DATE	TRANSACTION TYPE	PURPORTED MAKER OF CHECK OR WITHDRAWAL SLIP	CHECK OR WITH- DRAWAL SLIP PAYEE	TYPE OF FRAUDU- LENT ID	AMOUNT
9/17/2004	check no. 2448	A.G.G. & Associates, P.C.	P.B.	PA driver's license	\$4,651.37
9/17/2004	counter check	P.B.	"cash"	PA driver's license	\$3,500
9/18/2004	check no. 6024	E.C. & R.C.	P.B.	PA driver's license	\$4,800
9/18/2004	check no. 6023	E.C. & R.C.	P.B.	PA driver's license	\$4,800
9/18/2004	counter check	P.B.	P.B.	PA driver's license	\$4,000
9/19/2004	check no. 6026	E.C. & R.C.	P.B.	PA driver's license	\$4,800
9/19/2004	check no. 6025	E.C. & R.C.	P.B.	PA driver's license	\$4,800
9/20/2004	check no. 6027	E.C. & R.C.	P.B.	PA driver's license	\$4,800
9/20/2004	check no. 6029	E.C. & R.C.	P.B.	PA driver's license	\$4,800
11/23/2004	counter check	R.R.	"cash"	none	\$2,000
12/31/2004	check no. 361	H.J.	H.L.W.	none	\$3,500
1/3/2005	check no. 181	T.G.	H.L.W.	Hospital of Univ. of Pennsylvania	\$2,500
1/3/2005	check no. 184	T.G.	H.L.W.	Hospital of Univ. of Pennsylvania	\$950
1/5/2005	check no. 182	T.G.	H.L.W.	Hospital of Univ. of Pennsylvania	\$3,500
1/5/2005	check no. 188	T.G.	H.L.W.	Hospital of Univ. of Pennsylvania	\$950

In violation of Title 18, United States Code, Section 1344.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Wachovia Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 33869.

2. On or about July 15, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

GEORGE TAYLOR

knowingly executed and attempted to execute a scheme to defraud Wachovia Bank and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendant GEORGE TAYLOR pretended to be another person in order to cash stolen, counterfeit, and otherwise unauthorized checks at Wachovia Bank.

4. On each occasion, defendant GEORGE TAYLOR presented to a teller a fraudulent check payable to a Wachovia Bank account holder. Defendant TAYLOR, pretending to be the Wachovia Bank account holder and check payee, then asked the bank to process the transactions.

5. Defendant GEORGE TAYLOR obtained a fraudulent Pennsylvania driver's license that identified him as the Wachovia Bank account holder that he pretended to be. Defendant TAYLOR presented this fake identification when he asked the tellers to process his transactions.

6. By cashing the checks in other people's names, defendant GEORGE TAYLOR stole and attempted to steal approximately \$14,378.08 from Wachovia Bank.

7. In this manner, defendant GEORGE TAYLOR cashed and attempted to cash each of the checks listed below:

DATE	CHECK NUMBER	PURPOSED IDENTITY MAKER OF CHECK	FALSE USED BY PAYEE	TYPE OF FRAUDULENT ID	AMOUNT
7/15/2004	010621	D.S. Architects	D.B.	PA driver's license	\$7,189.04
7/15/2004	010675	D.S. Architects	D.B.	PA driver's license	\$7,189.04

In violation of Title 18, United States Code, Section 1344.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 26, 2004, in the Eastern District of Pennsylvania, defendant

GEORGE TAYLOR

knowingly possessed and used, without lawful authority, a means of identification of another person, that is, the name F.T., during and in relation to bank fraud, in violation of Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 2, 2004, in the Eastern District of Pennsylvania, defendant

GEORGE TAYLOR

knowingly possessed and used, without lawful authority, a means of identification of another person, that is, the name F.M., during and in relation to bank fraud, in violation of Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 10, 2004, in the Eastern District of Pennsylvania,
defendant

GEORGE TAYLOR

knowingly possessed and used, without lawful authority, a means of identification of another person, that is, the name H.D., during and in relation to bank fraud, in violation of Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 17, 2004, in the Eastern District of Pennsylvania,
defendant

GEORGE TAYLOR

knowingly possessed and used, without lawful authority, a means of identification of another person, that is, the name P.B., during and in relation to bank fraud, in violation of Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 23, 2004, in the Eastern District of Pennsylvania,
defendant

GEORGE TAYLOR

knowingly possessed and used, without lawful authority, a means of identification of another person, that is, the name R.R., during and in relation to bank fraud, in violation of Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 31, 2004, in the Eastern District of Pennsylvania, defendant

GEORGE TAYLOR

knowingly possessed and used, without lawful authority, a means of identification of another person, that is, the name H.L.W., during and in relation to bank fraud, in violation of Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

A TRUE BILL:

GRAND JURY FOREPERSON

**PATRICK L. MEEHAN
UNITED STATES ATTORNEY**